Air Quality Permitting
Statement of Basis

October 8, 2008

Tier I Operating Permit No. T1-2007.0158

Idaho Power Company Evander Andrews Complex
Mountain Home, Idaho

Facility ID No. 039-00024

Prepared by:

Tracy Drouin and Ken Hanna, Permit Writers
Air Quality Division

FACILITY DRAFT

Table of Contents

Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CT	combustion turbine
DAHS	data acquisition and handling system
DEQ	Department of Environmental Quality
DLN	dry low NO_x
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
MW	mega watt
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
O_2	oxygen
PM	Particulate Matter
PM_{10}	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO_2	sulfur dioxide
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Idaho Power Company regarding the operation of its Evander Andrews Complex facility located in Mountain Home. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.313.

2. FACILITY DESCRIPTION

The Idaho Power Company (Idaho Power) operates the Evander Andrews Complex located near Mountain Home, Idaho. This is an electric power generating facility which currently utilizes two existing advanced Siemens-Westinghouse (S-W) 251B12A, simple cycle combustion turbines (CT2 and CT3) and generators. The heat input for each turbine is approximately 508 MMBtu/hr and the generating capacity is approximately 52 megawatts each. Both turbines are identical in design, fired only with natural gas, and are equipped with dry low NO_x (DLN) burners. DLN burners combust a leaner mixture of fuel and air, thereby lowering the peak temperature and NO_x emissions. During warm weather, evaporative cooling and inlet air fogging may be used to cool the turbine inlet air. Natural gas flow rates are measured continuously by a certified fuel flow monitoring system. Facility operations are monitored by an integrated microprocessor-based control system. Each combustion turbine is equipped with a continuous emissions monitoring system (CEMS) to measure NO_x, carbon monoxide (CO), and diluent oxygen (O_2). Also included is a data acquisition and handling system (DAHS) for data acquisition and analysis. These data systems are used during all facility operations, including startup and shutdown. Ancillary units at the facility include a natural gas-fired heater to heat the natural gas prior to combustion and a diesel-fired emergency fire pump.

In 2007, the facility added a 170-megawatt (170-MW) Siemens Westinghouse Model SGT6-5000F (previously named W501F) simple-cycle combustion turbine (CT1) with generator and a Sivalls, Inc., 3.6 MMBtu/hr natural gas-fired heater (H2) used to heat the natural gas prior to combustion in the turbine. The turbine is used to provide electrical power to meet peak system load requirements according to the facility.

3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Refer to Section 6.2 of this document for a complete emissions inventory of the air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.30.

This facility is a major facility as defined by IDAPA 58.01.01.205 because it emits or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 4911, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in Elmore County, which is classified as unclassifiable for all criteria pollutants (PM_{10}, CO, NO_x, SO_2, lead and ozone). There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 63 and Universal Transverse Mercator (UTM) Zone 11.

4. APPLICATION SCOPE

The Tier I Operating Permit was reopened for cause in accordance with IDAPA 58.01.01.386. This permitting action incorporates PTC No. P-060065 and modifies the Tier I Operating permit to include acid rain permit requirements as they apply to combustion turbine CT1 which was constructed at the facility in 2007. This Tier I Operating Permit replaces Tier I Operating Permit No. TI-020041, the terms and conditions of which no longer apply.

5. SUMMARY OF EVENTS

July 28, 2007	DEQ receives acid rain permit application, determines application complete and reopens the Tier I Operating Permit
December 5, 2007	Peer/Regional Office review of draft permit
June 9, 2008	Peer/Regional Office review of draft permit
June 27, 2008	Draft permit sent to Idaho Power for review
September 29, 2008	Comments were received from Idaho Power

5.1 Permitting History

May 1, 2007	Initial PTC No. P-060065 issued to construct turbine SGT6-5000F, CT1 (A)
September 9, 2005	Initial Tier I Operating Permit No. TI-020041, issued for the facility (A)
March 18, 2005	Revised PTC No. P-040031 issued to streamline conditions to be similar with other Idaho Power turbine permits (A)
August 21, 2002	Revised PTC No. 039-00024 issued to clarify conditions similar that done for the previous PTC (S)
July 19, 2002	Revised PTC No. 030-00024 issued to clarify conditions for fire pump, SO_2 monitoring options, PM testing and CEMS use (S)
September 14, 2001	Initial PTC No. 030-00024 issued for construction of CT1 and CT2 (S)

6. PERMIT ANALYSIS

6.1 Basis of Analysis

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- PTC No. P-060065, issued May 1, 2007
- Tier I Operating Permit No. TI-020041, issued September 9, 2005
- Acid Rain Permit application received July 28, 2007
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

6.2 Emissions Description and Emissions Inventory

Based on the emissions inventories included in the Statements of Basis for PTC No. 060065 issued May 1, 2007 and PTC No. P-040031 issued March 18, 2005, following are the estimated total emissions for Title V permitting purposes for the Evander Andrews Complex.

Table 6.1 Controlled Potential to Emit

Source Description	CO		NO_x		PM / PM_{10}		SO_2		VOC	
	lb/hr	T/yr	lb/h	T/yr	Lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Combustion Turbine (CT1)	41	248	61	247	10.00	43.80	1.10	4.82	2.80	12.26
Combustion Turbine (CT2)	32	75	52	124	5.0	12	1.4	3.4	3.0	7.3
Combustion Turbine (CT3)	32	75	52	124	5.0	12	1.4	3.4	3.0	7.3
Fuel Heater (H1)	0.065	0.17	0.33	0.84	0.016	0.042	0.002	0.005	0.017	0.0044
Fuel Heater (H2)	0.37	1.60	0.44	1.91	0.03	0.13	0.03	0.11	0.05	0.21
Emergency Fire Pump	2.54	.064	6.9	0.17	0.013	0.0033	0.096	0.0024	0.30	0.01
Total facility emissions	---	398	---	498	---	68	---	11.63	---	26.97

7. REGULATORY ANALYSIS

7.1 IDAPA 58.01.01.386 – Permit Changes, Reopening for Cause

On May 1,2007, DEQ issued PTC No. P-060065 for a new turbine to Idaho Power Evander Andrews Complex, in accordance with IDAPA 58.01.01.200 through 228. The PTC does not contravene the existing Tier I operating permit conditions and may be incorporated into the Tier I operating permit. In accordance with IDAPA 58.01.01.386.01, the Tier I operating permit can be reopened for cause. DEQ has determined that it is necessary to reopen the existing Tier I operating permit for cause in accordance to IDAPA 58.01.01.386.01.a and .b. The reopening process will be conducted in accordance with IDAPA 58.01.01.360 through 379.

7.2 New Source Performance Standards (NSPS) - 40 CFR 60

The two existing combustion turbines remain subject to Subpart GG. The new combustion turbine is not subject to Subpart GG, however, it is subject to Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. Applicable NSPS requirements are included as conditions in the respective PTCs and the PTC conditions have been added to the Tier I permit.

With regard to turbines CT2 and CT3 (but not CT1), Subpart GG has been modified since the Tier I permit was last issued. The change was issued in 71 FR 9458 on February 24, 2006. A copy of the changes to Subpart GG is shown below:

"PART 60--[AMENDED], Subpart GG--[Amended]

2. Section 60.334 is amended by:

a. Revising paragraphs (c) and (e);

b. Revising paragraph (f) introductory text and (f)(2); and

c. Revising paragraph (j) introductory text, (j)(1)(iv), and (j)(5) to read as follows:

Sec. 60.334 Monitoring of operations.

(c) For any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and which does not use steam or water injection to control NO_x emissions, the owner or operator may, but is not required to, for purposes of determining excess emissions, use a CEMS that meets the requirements of paragraph (b) of this section. Also, if the owner or operator has previously submitted and received EPA, State, or local permitting authority approval of a procedure for monitoring compliance with the applicable NOX emission limit under Sec. 60.332, that approved procedure may continue to be used.

(e) The owner or operator of any new turbine that commences construction after July 8, 2004, and which does not use water or steam injection to control NOX emissions, may, but is not required to, elect to use a NOX CEMS installed, certified, operated, maintained, and quality-assured as described in paragraph (b) of this section. Other acceptable monitoring approaches include periodic testing approved by EPA or the State or local permitting authority or continuous parameter monitoring as described in paragraph (f) of this section.

(f) The owner or operator of a new turbine that commences construction after July 8, 2004, which does not use water or steam injection to control NOX emissions may, but is not required to, perform continuous parameter monitoring as follows:

(2) For any lean premix stationary combustion turbine, the owner or operator shall continuously monitor the appropriate parameters to determine whether the unit is operating in low-NOX mode.

(j) For each affected unit that elects to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content or fuel nitrogen content under this subpart, the owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with Sec. 60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under Sec. 60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined as follows:

(1) * * *

(iv) For owners or operators that elect, under paragraph (f) of this section, to monitor combustion parameters or parameters that document proper operation of the NOX emission controls:

(5) All reports required under Sec. 60.7(c) shall be postmarked by the 30th day following the end of each 6-month period.

3. Section 60.335 is amended by revising paragraph (b)(8) to read as follows:

Sec. 60.335 Test methods and procedures.

(b)(8) If the owner or operator elects under Sec. 60.334(f) to monitor combustion parameters or parameters indicative of proper operation of NO_x emission controls, the appropriate parameters shall be continuously monitored and recorded during each run of the initial performance test, to establish acceptable operating ranges, for purposes of the parameter monitoring plan for the affected unit, as specified in Sec. 60.334(g)."

An overall re-assessment of applicability of 40 CFR 60.334 is provided below since recent changes to this regulation have been substantial:

60.334(a) and (b) do not apply since neither CT2 nor CT3 use "water or steam injection to control NO_x emissions."

The changes to 40 CFR 60.334(c) apply to CT2 and CT3, therefore, Permit Condition 4.6 was changed accordingly.

60.334(d), (e) and (f) do not apply to the CT2 and CT3 because construction of CT2 and CT3 occurred prior to July 8, 2004.

60.335(g) does not apply because paragraphs (a), (d) and (f) of this section do not apply.

60.334(h) and (i) apply. These regulations allow several options for monitoring sulfur and nitrogen content in the fuel, and they are addressed by Permit Condition 4.11.

60.334(j)(1)(i) does not apply since "water or steam to fuel ration monitoring" is not used for CT2 or CT3. 60.334(j)(1)(ii) does not apply since Idaho Power did not elect "to take an emission allowance for fuel bound nitrogen" for CT2 or CT3. 60.334(j)(1)(iii) does apply and this is already addressed by Permit Condition 4.16.1. 60.334(j)(1)(iv), as revised, does not apply since 60.334(f) does not apply.

60.332(j)(2)(i) and (iii) apply, but (ii) does not apply since oil is not used for fuel. These regulations are addressed by Permit Condition 4.16.2, however, note that (iii) is now being added to this condition since it appears to have been inadvertently omitted in the previous permit.

Lastly, the changes to 40 CFR 60.335(b)(8) do not apply to CT2 and CT3 because the facility has elected to not do NO_x monitoring using the option under 40 CFR 60.334(f) and (g).

7.3 National Emission Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Parts 61 & 63

The Evander Andrews complex is not a major source of HAP emissions. It is not subject to any NESHAP requirements.

7.4 Acid Rain Program – 40 CFR 72

The Acid Rain Program requirements apply to all three combustion turbines. The currently effective Tier I permit already contains conditions with these requirements for CT2 and CT3. On July 28, 2007 DEQ received an Acid Rain Permit application from Idaho Power for CT1. DEQ then determined application complete and notified Idaho Power that the Tier I Operating Permit would be re-opened for cause to issue the Acid Rain permit as part of the Tier I permit.

40 CFR 72.70(b) addresses the relationship of the Title IV Acid Rain program, and it's permit requirements, to the Title V operating permit program. This regulation states that "Each State permitting authority with an affected source shall act in accordance with this part and parts 70, 74, 76, and 78 of this chapter for the purpose of incorporating Acid Rain Program requirements into each affected source's operating permit." Issuance of this Title V permit modification will satisfy this regulation for CT1 by including CTI as an applicable source in Section 8 of the Tier I permit.

As stated in the Statement of Basis for the initial Tier I operating permit issued for the Evander Andrews Complex, Idaho Power is subject to the acid rain permitting requirements of 40 CFR 72 through 75. The acid rain portion of the permit is drafted in the form of the EPA model permit based upon 40 CFR 72 and information previously provided by the EPA Acid Rain Division (see the 9-20-01 e-mail from R. Miller, EPA, to W. Russell, AirPermits.Com in the Appendix of the Statement of Basis for T1-020041). The substance of the acid rain permit for Idaho Power is that the company must comply with the requirements listed on the Phase II application submitted to the EPA.

8. PERMIT CONDITIONS

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions (PC) are identified as "Existing PC", and revised permit conditions are identified as "Revised PC."

8.1 Existing PC 2.6

The following PC regarding odor emissions was removed from the permit and 2.6 was labeled as "reserved" to preserve the numbering sequence in the permit. Initially this condition was included in response to concerns, prior to construction, from the public. For the numerous combustion turbines operating within the state, including the newer large units installed by Idaho Power, none have been found to have odorous emissions problems. Therefore, it is no longer appropriate to apply this additional monitoring and recordkeeping condition to the Evander Andrews Complex:

"The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]"

8.2 Section 3 of the Tier I permit

All of the applicable permit conditions from PTC No. P-060065, issued May 1, 2007 for CT1, were added into the Tier I permit in Section 3.

8.3 PC 3.8 and 3.13.1 of PTC No. P-060065 issued May 1, 2007

PTC Permit Condition 3.13.1 sets forth requirements for a DEQ-approved protocol addressing the methodology to quantify NO_x and CO emissions rates from CT1. This protocol was received by DEQ on January 18, 2007 and has been approved. PTC condition 3.8 was an "initial" requirement stating CTI shall not commence startup until the protocol requirements under PC 3.13.1 are met. Since the initial requirement under PC 3.8 has been met, it is no longer applicable, therefore, is not included in the Tier I permit. PC 3.8 is listed in the Tier I permit as "reserved" so that the PC numbering in the PTC and Tier I will continue to match.

8.4 New PC 3.12.2

The requirement to perform the "initial" CO RATA performance test within 60 days of achieving the maximum production rate was not included as shown in the corresponding PTC condition. It was removed because this test requirement has been met by the test performed on 2/29/08. The requirement to perform subsequent RATAs remains effective and is included in the Tier I permit.

8.5 Existing PC 4.6

"The permittee may, for purposes of determining if the emission standard specified in Permit Condition 4.2 is exceeded, use a NOx CEMS that meets the requirements of 40 CFR 60.334(b)."

Revised PC 4.6

PC 4.6 was revised to include the changes to 40 CFR Subpart GG (i.e., as specified in 71 FR 9458 on February 24, 2006). It now reads as follows:

"The permittee may, but is not required to, for purposes of determining excess emissions of the limit in Permit Condition 4.2, use a CEMS that meets the requirements of 40 CFR 60 334(b). Also, if the owner or operator has previously submitted and received EPA, State, or local permitting authority approval of a procedure for monitoring compliance with the applicable NOx emission limit under 40 CFR 60.332, that approved procedure may continue to be used."

8.6 Revised PC 4.16

To incorporate the changes to 40 CFR Subpart GG, the first sentence of PC 4.6 was revised to be "For each affected unit that elects to…". Previously it appeared as "For each affected unit required to…".

8.7 Existing PC 4.16.2

4.16.2 With regard to SO_2, in accordance with 40 CFR 60.334(j)(2)(i):

For samples of gaseous fuel obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.

Revised PC 4.16.2

The PC was revised to incorporate the applicable requirements of 40 CFR 60.334(j)(2)(iii) as follows:

4.16.2 With regard to SO_2, in accordance with 40 CFR 60.334(j)(2)(i) and (iii):

- For samples of gaseous fuel obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.
- A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime shall include only unit operating hours, and ends on the date and hour of the next valid sample.

8.8 Existing PC 4.16.3

4.16.3 All reports required under 40 CFR 60.7(c) shall be postmarked by the 30th day following the end of each calendar quarter in accordance with 40 CFR 60.334(j)(5).

Revised PC 4.16.3

PC 4.16.3 was revised to include the changes to 40 CFR Subpart GG as follows:

4.16.3 All reports required under 40 CFR 60.7(c) shall be postmarked by the 30th day following the end of each 6-month period in accordance with 40 CFR 60.334(j)(5).

8.9 Existing PC 8.1

Existing PC 8.1 was revised so it is clear that the Title IV Acid Rain Program requirements now apply to all turbines at the site, including CT1, and not just to CT2 and CT3.

9. INSIGNIFICANT ACTIVITIES

There are no changes to the list of insignificant activities for this facility corresponding to the lists in IDAPA 58.01.01.317.01(b).

10. ALTERNATIVE OPERATING SCENARIOS

There is no change to the permit with respect to alternative operating scenarios.

11. TRADING SCENARIOS

There is no change to the permit with respect to trading scenarios.

12. COMPLIANCE SCHEDULE

12.1 Compliance Plan

There are no outstanding compliance issues with this facility. Compliance Plan requirements are not applicable per IDAPA 58.01.01.322.10.

12.2 Compliance Certification

Idaho Power Company-Evander Andrews Complex in Mountain Home is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

13. PERMIT REVIEW

13.1 Regional Review of Draft Permit

DEQ provided the draft permit to its Boise Regional Office on December 5, 2007 and on June 9, 2008.

13.2 Facility Review of Draft Permit

DEQ provided the draft permit to Idaho Power Company-Evander Andrews Complex in Mountain Home for its review on June 27, 2008. The comments received from Idaho Power on September 29, 2008 and DEQ's responses are described below:

- Permit Condition 1.4: Source Description

- Facility Comment: CTI, New turbine has ultra lo-NOx combustors (ULN) and stack dimensions 24'9" x 21'10". CT2 and CT3 stack dimensions are 19'4" x 9'7"
- DEQ Response: The permit descriptions were corrected as requested.
- Permit Condition 3: Summary description.
- Facility Comment: Control device description and Table 3.1 should show Ultra Low-NOx combustors rather than dry low-NOx.
- DEQ Response: The permit descriptions were corrected as requested.
- Permit Condition 3.3 and Table 3.1: NSPS NOx limit for CT1.
- Facility Comment: The 15 ppm NOx limit is to be calculated by a 4-hr average as we discussed earlier.
- DEQ Response: Permit Condition 3.3 and Table 3.1 were revised as requested to indicate that the NSPS NOx limit shall be based on a 4-hour rolling average basis per 40 CFR 60.4350(g) and 60.4380(b)(1).
- Permit Condition 4: Summary description.
- Facility Comment: Turbines do not use the air fogging system at this time.
- DEQ Response: The permit allows this system to be used, therefore, the description has been left unchanged in the permit.
- Permit Condition 5: Summary description.
- Facility Comment: H2 manufacturer is GTS Energy and heat input is 3.8 MMBtu/hr.
- DEQ Response: The permit description was corrected as requested.

13.3 Public Comment

DEQ will provide the draft permit for public comment as required by IDAPA 58.01.01.364.

14. ACID RAIN PERMIT

Idaho Power Company-Evander Andrews Complex is subject to the requirements of 40 CFR 72 through 75. CTI was included as an applicable source in Section 8, the Acid Rain Permit requirements, of the Tier I Operating Permit.

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

TD/KH/ Permit No. T1-2007.0158

APPENDIX

AIRS Data Entry Form

Idaho Power Company-Evander Andrews Complex
Mountain Home

Tier I Operating Permit No. T1-2007.0158

Facility ID No. 039-00024

AIRS/AFS Facility-wide Classification Form

Facility Name: Idaho Power Company, Evander Andrews Complex

Facility Location: Mountain Home, ID

Facility ID: 039-00024 Date: October 8, 2008

Project/Permit No.: T1-2007.0158 Completed By: Ken Hanna

☒ Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)

☐ Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO_2	PM10	VOC
Area Classification:	U	U	U

DO NOT LEAVE ANY BLANK

Check one of the following:

☐ **SIP** [0] - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR

☒ **Title V** [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	**B**	**A**	**A**	**B**	**B**	**B**	**B**

☒ **PSD** [6] - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	☐	☒	☒	☐	☐	☐	☐

☐ **NSR - NAA** [7] - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR-NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	☐	☐	☐	☐	☐	☐	☐

☐ **NESHAP** [8] - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

☒ **NSPS** [9] - Yes, this facility is subject to NSPS (Part 60) requirements.

ıat CFR Subpart(s) is applicable? GG, KKKK

If yes, identify the pollutant(s) regulated by the subparts listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	☐	☒	☐	☐	☐	☐	☐

☐ **MACT** [M] - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?